

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT  
OF TENNESSEE, NASHVILLE DIVISION**

VIMALA, LLC, ET AL.,

PLAINTIFFS,

v.

WELLS FARGO BANK, N.A., ET  
AL.,

DEFENDANTS.

No. 3:19-cv-00513  
JUDGE RICHARDSON

**PLAINTIFFS' MOTION TO DIRECT SPECIAL MASTER TO SHARE  
SEALED DOCUMENTS WITH PLAINTIFFS**

Plaintiffs Vimala, LLC and Alecia Venkataraman respectfully request that the Court direct the Special Master to share the Reply and the Report sealed by the Court pursuant to the Court's May 2, 2023 Order (Docket No. 223) with Plaintiffs' undersigned counsel.

Plaintiffs' counsel has made this request to California counsel for the Special Master, who has stated that the Special Master requires a Court Order to share the sealed documents with undersigned counsel.

The documents filed by the Special Master are in reply to the response filed by Plaintiffs on the fee/contempt issues, so it is appropriate for the Special Master to share the full documents with Plaintiffs' undersigned counsel.

Respectfully submitted,

/s/ Michael G. Abelow

Michael G. Abelow (No. 26710)

[mabelow@srvhlaw.com](mailto:mabelow@srvhlaw.com)

SHERRARD ROE VOIGT & HARBISON, PLC  
150 3rd Avenue South, Suite 1100  
Nashville, Tennessee 37201  
Telephone: (615) 742-4200  
Fax: (615) 742-4539  
Counsel for Vimala, LLC and Alecia  
Venkataraman.

**CERTIFICATE OF SERVICE**

I certify that on this day, May 8, 2023, a true and exact copy of the foregoing document has been served on the following counsel by CM/ECF, and by email to the Special Master:

William W. Drinkwater, Esq.  
NELSON, MULLINS, RILEY & SCARBOROUGH, LLP  
150 Fourth Ave, N  
Suite 1100  
Nashville, TN 37219  
*Attorneys for Defendants Wells Fargo Bank, N.A. and Wells Fargo Merchant Services, LLC*

Jarrold D. Shaw  
Nellie E. Hestin  
MCGUIRE WOODS, LLP  
Tower Two-Sixty  
260 Forbes Avenue, Suite 1800  
Pittsburgh, PA 15222  
Phone: (412) 667-7909  
*Attorneys for Defendants Wells Fargo Bank, N.A. and Wells Fargo Merchant Services, LLC*

Jeff Switzer  
EVANS, JONES & REYNOLDS, P.C.  
401 Commerce Street, Suite 710  
Nashville, TN 37219  
Attorneys for BARHAM & MARCURE, LLC

Scott Cooper Pegasus Squire, Inc.  
12021 Wilshire Blvd., Ste 770  
Los Angeles, CA 90025-1206  
[scott@pegasussquire.com](mailto:scott@pegasussquire.com)

/s/ Michael G. Abelow